

EXHIBIT

23

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☒ FEPA

E06C056(R/NO)-029

☐ EEOC

12B-2006-00504

Baltimore Community Relations Commission

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Geraldine Lauture

Home Phone (Incl. Area Code)

410-796-1027

Date of Birth

05/13/1970

Street Address

6905 Scarlet Oak Drive

City, State and ZIP Code

Elkridge, MD 21075

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

St. Agnes Hospital

No. Employees, Members

500+

Phone No. (Include Area Code)

410-368-6000

Street Address

900 S. Caton Avenue

City, State and ZIP Code

Baltimore, MD 21229

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☒ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☒ NATIONAL ORIGIN
☐ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify below.)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

01/04/2006**03/10/2006**

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I had worked as a Medical Lab Technician for St. Agnes Hospital since August 2004. From my hire until December 2005, I worked the evening shift, Monday thru Friday. During that period of time, I always received satisfactory evaluations including my most recent one. My good work performance resulted in management giving me the responsibility of training two new Medical Technologists. On December 5, 2005, at my request, I began working the dayshift. From that time until my resignation I believe that I was subjected to discrimination on the bases of my race, African-American and National Origin, Haitian, because:

1. From the beginning of my move to dayshift, I had been accused of not getting along with coworkers, most of whom are white and American born.
2. I was written up and wrongly accused of endangering co-workers and hospital staff due to poor lab techniques. As a result I was suspended without pay and told I would be investigated. Following that investigation I was told that I lacked the fundamental knowledge to correct the issues and this could not be corrected by training.
3. I was ordered to be retrained which I accepted, hoping that the situation would be resolved. Stephanie Rutter, a white American born Lab Assistant who was accused of the same action was not reprimanded or ordered retrained.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

NOTARY When necessary for State and Local Agency Requirements

F. Down

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

X [Signature]

4/7/06

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

April 7, 2006

Date

Charging Party Signature

My Commission expires February, 2009

STA00371

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☐ FEPA
☐ EEOC

Baltimore Community Relations Commission

and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

4. Stephanie Rutter, was required to assist me, but refused to do so. My complaints to management were completely disregarded. Shortly after my retraining, Ms. Rutter went to Human Resources (HR) and falsely accused me of threatening her safety. As a result I was called into a meeting in HR and told that I was making things hard on myself and I should stop. Due to the unbearable work environment, I resigned on March 10, 2006.

Because of the aforementioned I, therefore, charge the above-named Respondent and/or its agents with violation of Article 4 (entitled "Community Relations") of the Baltimore City Code.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Date

Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

X *[Signature]*

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

4/7/06

April 7, 2006